

**MANDATORY**  
**CHAMBERS COPY**  
NOTE CHANGES MADE BY THE COURT

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

SILVA ZADOIAN,  
Plaintiff,  
v.

TARGET CORPORATION, and DOES  
1 to 10, Inclusive,  
Defendants.

Case No. 2:19-CV-00326-DSF-AGR  
**[PROPOSED] ORDER RE:  
STIPULATED PROTECTIVE  
ORDER**

NOTE CHANGES MADE BY THE COURT

GOOD CAUSE APPEARING, the Court hereby orders that the following procedures shall govern the Stipulated Protective Order between Plaintiff SILVA ZADOIAN and Defendant TARGET CORPORATION:

1. This Order is meant to encompass all forms of disclosure which may contain confidential material, including all documents, pleadings, motions, exhibits, declarations, affidavits, deposition transcripts, inspection reports, and all other tangible items (electronic media, photographs, videocassettes, etc.) For purposes of this Stipulated Protective Order, <sup>the parties defined</sup> confidential material ~~is defined~~ as Target Corporation's policies and procedures documents.

2. Good cause exists for this stipulated protective order because Target's policies and procedures documents contain proprietary information of Target and Target only authorizes production of these proprietary documents subject to a protective order. Target would suffer harm if its proprietary policies and procedures documents were disseminated.

3. The parties may designate any confidential material produced or filed

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1 in this Lawsuit as confidential and subject to the terms of this Order by identifying  
2 such materials as confidential. Any material identified as confidential shall not be  
3 disclosed to any person or entity except to the parties, counsel for the respective  
4 parties, and expert witnesses assisting counsel in this Lawsuit, and the Court.

5 4. Any material designated as confidential pursuant to paragraph 1 above  
6 shall be used solely for the purposes of this Lawsuit and for no other purpose.

7 5. If additional persons become parties to this Lawsuit, they shall not have  
8 access to any confidential material until they execute and file with the Court their  
9 written agreement to be bound by the terms of this Order.

10 6. In the event that any question is asked at a deposition that calls for the  
11 disclosure of confidential material, the witness shall answer such question (unless  
12 otherwise instructed not to do so on grounds of privilege) provided that the only  
13 persons in attendance at the deposition are persons who are qualified to receive such  
14 information pursuant to this Order. Deposition testimony may be designated as  
15 confidential following the testimony having been given provided that: (1) such  
16 testimony is identified and designated on the record at the deposition, or (2) non-  
17 designating counsel is notified of the designation in writing within thirty days after  
18 receipt by the designating party of the respective deposition transcript. All  
19 deposition transcripts in their entirety shall be treated in the interim as confidential  
20 pursuant to paragraph 1 above. When confidential material is incorporated in a  
21 deposition transcript, the party designating such information confidential shall make  
22 arrangements with the court reporter not to disclose any information except in  
23 accordance with the terms of this Order.

24 7. If a party believes that any confidential material does not contain  
25 confidential information, it may contest the applicability of this Order to such  
26 information by notifying the designating party's counsel in writing and identifying  
27 the information contested. *consistent with the scheduling order.* The parties shall have thirty days after such notice to  
28 meet and confer and attempt to resolve the issue. If the dispute is not resolved

1 within such period, the party seeking the protection shall have thirty days in which  
2 to make a motion for a protective order with respect to contested information.  
3 Information that is subject to a dispute as to whether it is properly designated shall  
4 be treated as designated in accordance with the provisions of this Order until the  
5 Court issues a ruling.

6 8. Inadvertent failure to designate any material confidential shall not  
7 constitute a waiver of an otherwise valid claim of confidentiality pursuant to this  
8 Order, so long as a claim of confidentiality is asserted within fifteen days after  
9 discovery of the inadvertent failure. At such time, arrangements shall be made by  
10 the parties to designate the material confidential in accordance with this Order.

11 9. This Order shall be without prejudice to the right of any party to oppose  
12 production of any information or object to its admissibility into evidence.

13 10. When any counsel of record in this Lawsuit or any attorney who has  
14 executed a Confidentiality Agreement becomes aware of any violation of this Order,  
15 or of facts constituting good cause to believe that a violation of this Order may have  
16 occurred, such attorney shall report that there may have been a violation of this  
17 Order to the Court and all counsel of record.

18 11. Within thirty days after the termination of this Lawsuit (whether by  
19 dismissal of final judgment), all confidential material (including all copies) shall be  
20 returned to counsel for the designating party. In addition, counsel returning such  
21 material shall execute an affidavit verifying that all confidential material produced  
22 to such counsel and any subsequently made copies are being returned in their  
23 entirety pursuant to the terms of this Order. Such a representation fully  
24 contemplates that returning counsel has: (1) contacted all persons to whom that  
25 counsel disseminated confidential material, and (2) confirmed that all such material  
26 has been returned to disseminating counsel.

27 12. After the termination of this Lawsuit, the provisions of this Order shall  
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1 continue to be binding and this Court shall retain jurisdiction over the parties and  
2 any other person who has access to documents and information produced pursuant  
3 to this Order for the sole purpose of enforcement of its provisions.

4 IT IS SO ORDERED.

5 Dated: 9/6/2019

Alicia G. Rosenberg

United States Magistrate Judge

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